

REMARKS

Claims 1 to 10 were pending in the application at the time of examination. Claims 1 to 10 stand rejected as anticipated.

Applicants have amended the description to correct grammatical errors.

Claims 2, 4 and 5 are amended to more clearly recite the invention.

Claims 1 to 10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,453,353, hereinafter referred to as Win. The Examiner stated, in part:

enrolling with an authority, said enrolling creating enrollment results, said enrollment results comprising user data (abstract, figures 1, 5, col. 6, lines 19-54, col. 9, lines 14-col. 10, lines 63);

using said enrollment results to obtain a service from a service provider, said service provider capable of communicating with said authority to verify said enrollment results (abstract, figures 1, 3B-3C, col. 6, lines 58-65, col. 7, lines 15-col. 8, lines 4).

Applicants respectfully traverse the anticipation rejection of Claim 1. Win taught:

When the user selects a resource, the browser sends an open URL request and cookie to a Protected Web Server. A Protected Web Server is a web server with resources protected by the Runtime Module. The Runtime Module decrypts information in the cookie and uses it to verify that the user is authorized to access the resource. The cookie is also used by the resource to return information that is customized based on the user's name and roles.

Win, Col. 6, lines 58 to 65

Thus, Win taught that the Runtime Module on the Protected Web Server performed the verification of the user's access. The

description of Fig. 3B further supports this interpretation.  
Specifically,

FIG. 3B is a state diagram showing processes carried out when the URL is a protected resource. As shown by state 312, Runtime Module 206 calls the Authentication Verification Service to check whether an authenticated user is making the request.

Win, Col. 8, lines 23 to 27. Win taught that the "Authentication Verification Service" was part of the RunTime Module 206 on Protected Server 104. See Win, Col. 7, lines 34 to 41.

Thus, Win unambiguously taught the Protected Server 104 performed the verification. In contrast, Claim 1 recites:

. . . said service provider capable of communicating with said authority to verify said enrollment results

The rejection failed to cite any teaching in Win of this capability. As quoted above, Protected Server 104 of Win did the verification and so there was no need for such capability. Accordingly, Win not only fails to teach the invention of Claim 1, but also Win teaches away from the invention.

Applicants respectfully note that to support an anticipation rejection, the MPEP requires:

**TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM**

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). . . . "The identical invention must be shown in as complete detail as is contained in the . . . claim." . . . .

MPEP § 2131, 8th Ed., Rev. 2, p. 2100-73 (May 2004).

Applicants have demonstrated that the citations to Win in the rejection fail to show "The identical invention . . . in as complete detail as is contained in the . . . claim." Therefore, Win fails to anticipate Claim 1. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claims 2, 3, 4, 5, and 8 include a limitation equivalent to that quoted above from Claim 1. Thus, the comments with respect to Claim 1 are applicable to each of Claims 2 to 5 and 8, and are incorporated herein by reference. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 2 to 5 and 8.

In the anticipation rejection of Claim 6, the rejection stated in part:

means for receiving a user-controlled secure storage device (Figs. 5A-C, col. 9, lines 51-col. 10, lines 26);

Figs 5A to 5C of Win are steps in a user verification process, a login process, and in generating user profile information, respectively. These figures do not show "a user-controlled secure storage device." Similarly, the cited portion of Win describes the process of Fig. 5A, and fails to even mention "a user-controlled secure storage device." According to the above quotation from the MPEP, Win fails to anticipate Claim 6. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 6.

Claims 7 and 9 have been cancelled and so the anticipation rejections of these claims are moot.

Applicants respectfully traverse the anticipation rejection of Claim 10. The rejection cites to Figs. 3B and 3C for which Win taught:

. . . A user is considered authenticated if the request contains a "user cookie" that can be decrypted, and the request's IP address matches that in the cookie.

Win, Col. 8, lines 28 to 31. This fails to suggest or disclose:

to accept a service request, a first set of user data and a second set of user data,


as recited in Claim 10.

Win at most teaches receipt of a request that contains a user cookie. Accordingly, Win fails to teach a service request and two sets of user data. According to the above quotation from the MPEP, Win fails to anticipate Claim 10. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 10.

Claims 1 to 6, 8 and 10 remain in the application. Claims 2, 4 and 5 were amended. Claims 7 and 9 were cancelled. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

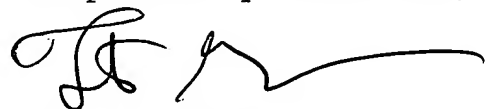
**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on June 30, 2005.

  
Attorney for Applicant(s)

June 30, 2005  
Date of Signature

Respectfully submitted,



Forrest Gunnison  
Attorney for Applicant(s)  
Reg. No. 32,899  
Tel.: (831) 655-0880